CPA MICS COMPLIANCE CHECKLIST

MANUAL KENO

Clic Nai	ent me:	Audit Perio			Prepared By:				
whe (MI ope	NGC Regulation 6.090(9) requires the CPA to use "criteria established by the chairman" in determining whether a Group I or Group II licensee is in compliance with the Minimum Internal Control Standards (MICS). This checklist is to be used by the CPA in determining whether the licensee's manual keno operations are in compliance with the Manual Keno Minimum Internal Control Standards. Indicate licensee personnel contacted:								
	ete of Inquiry	Person Inte			Po	sition			
ע	ate of Inquiry	Person Inte	rviewed		Pos	SILIOII			
to r app	Unless otherwise instructed, examine a completed document for compliance for those Questions referring to records/documentation (denoted by underlined question numbers in bold print), recalculating where appropriate. Indicate (by tickmark) whether the procedures were confirmed via examination/review of documentation, through inquiry of licensee personnel or via observation of procedures. Tickmarks used: Confirmed via examination/review Confirmed via inquiry Confirmed via observation								
					<u>Yes</u>	<u>No</u>	W/P <u>Ref</u> .		
Ph	ysical Conti	rols Over Equipm	ent Utilized						
1.		e and desk area restricted stricted to preclude write							
2.	Is effective peri equipment?	odic maintenance planne	ed to service ker	10					

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					W/P
3.	Is l	keno equipment maintenance independent of the keno function?	<u>Yes</u>	<u>No</u>	<u>Ref</u> .
4.		es keno maintenance report irregularities to management esonnel independent of keno, either in writing or verbally?			
Gá	ame	e Play			
5.	Is t	he individual controlling inside tickets either:			
	a.	Precluded from writing and making payouts, including during writer's break periods? or			
	b.	Are all winning tickets written by him with payouts exceeding \$25.00 verified, regraded, and compared to the inside ticket by another keno employee?			
	c.	If the answer to Question 5(a) is "no", does that individual write tickets out of his own predesignated writer's station and bank (unless a community bank is used)?			
6.	for	the licensee's total keno write is greater than or equal to \$500,000 the 12-month period ended June 30, does the licensee prohibit a no game to be operated by one person?			
7.	Fo	r a keno game being operated by one person:			
	a.	Is the licensee's total keno write less than \$500,000 for the 12-month period ended June 30? and			
	b.	Are the additional audit procedures in Question 47 performed?			
Tes	sting	g of Questions 8-10 is required.			
		Select 10 outside and 10 inside keno tickets per day for 2 days r. Test days must be in non-consecutive months.			
<u>8.</u>	(re	e both inside (ticket presented by customer for play) and outside ceipt ticket given customer by keno writer) keno tickets stamped th (as applicable to the system being used):			
	a.	The date?			

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			Yes	<u>No</u>	W/P <u>Ref</u> .
	b.	Ticket sequence number?	<u>105</u>	<u>110</u>	<u>KCI</u> .
	c.	Game number?			
<u>9.</u>	Do	es the ticket indicate that it is multi-race (if applicable)?			
		Select 10 openers and 10 closers per day for 2 days per year. ys must be in non-consecutive months.			
<u>10.</u>	Are	e the game openers and closers stamped with:			
	a.	The date?			
	b.	Ticket sequence number?			
	c.	Game number?			
	d.	If not, is there an alternative which provides the same control?			
11.		controls exist to ensure that inside tickets have been received n outstations prior to calling of a game?			
12.		controls exist to prevent the writing and voiding of tickets after ame has been closed?			
Tes	ting	of Questions 13-14 is required.			
		Select payout documentation for 2 shifts per year. Test shifts be in non-consecutive months.			
<u>13.</u>	(car	legible restricted copy of written keno tickets created rbonized locked box copy, microfilm, videotape, etc.) for, at a himum, all winning tickets exc eeding \$30.00?			
14.	(car	legible restricted copy of written keno tickets is not created rbonized locked box copy, microfilm, videotape, etc.) for winning tets of \$30.00 or less is the desk person precluded from writing tets?			
15.	med	e procedures established for locking out or closing down all chanisms for ticket writing/filming and time stamp equipment ile keno balls for that race are being selected?			

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<u>16.</u>	Wł	When it is necessary to void a ticket which contains the sequence number, is the ticket designated as "void" and initialed or signed by at least one person?	<u>Yes</u>	<u>No</u>	W/P <u>Ref</u> .
Nu	ıml	ber Selection			
17.		a camera utilized to film the following both prior to, and osequent to, the calling of a game:			
	a.	Empty rabbit ears?			
	b.	Date and time?			
	c.	Game number?			
	d.	Full rabbit ears?			
<u>18.</u>		es the picture of the rabbit ears on the camera provide a legible ntification of the numbers on the balls drawn?			
<u>19.</u>		keno personnel produce a draw ticket as numbers are drawn ich contains:			
	a.	The race number?			
	b.	Numbers drawn?			
	c.	Date?			
	d.	Verification to the balls drawn by a second keno employee?			
20.		e there procedures in effect which prevent unauthorized access keno balls in play?			
21.		e back-up keno ball inventories secured in a manner to prevent authorized access?			
22.		e effective procedures established for inspecting new keno balls into play as well as for those in use?			

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			Yes	<u>No</u>	W/P <u>Ref</u> .
Wi	inn	ing Ticket Verification and Payment			
<u>23.</u>	bef	e all winning tickets compared with the draw ticket by the writer ore being paid, marked with evidence that the ticket was "paid" marked with the amount of the payout?			
24.		e payouts over a predetermined amount (not to exceed \$30.00) ified by actual examination of the inside ticket?			
<u>25.</u>	loca	wins over a specified dollar amount (not to exceed \$10,000 for ations with annual keno write in excess of \$5,000,000 and \$3,000 all other locations) also require the following:			
	<u>a.</u>	Approval of management personnel independent of the keno department evidenced by their signature?			
	b.	Examination of films of rabbit ears prior to and after the game is called to determine that the same numbers called were not left up from the prior game and to verify the accuracy of the draw ticket?			
		Note: If necessary, film may be developed as soon as possible after payouts.			
	c.	Regrading of the inside ticket and comparison of both the winning ticket presented for payment and the inside ticket to the restricted copy (machine copy, microfilm, videotape, etc.)?			
	<u>d.</u>	Documentation of procedures described above for later verification and reconciliation by the keno audit process on a ball check form?			

Check Out Standards

Testing of Question 26 is required.

Scope: Select 1 summary report per day for 2 days per year. Test days must be in non-consecutive months.

26. Is a cash summary report (count sheet) prepared for the end of every shift which includes:

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			Yes	No	W/P Ref.
	a.	Computation of cash proceeds for the shift by bank (i.e., community bank or individual writer banks, whichever is applicable)?			
	b.	Signatures in ink of two employees who have verified the cash proceeds recorded in the above computation?			
Sta	atis	tics			
<u>27.</u>		e records maintained which include (for each licensed game) win, te, and win-to-write hold percentage for:			
	a.	Each shift?			
	b.	Each day?			
	c.	Month-to-date?			
	d.	Year-to-date?			
28.	leas	es non-keno management review keno statistical information at st on a monthly basis and investigate any large or unusual cistical fluctuations?			
<u> 29.</u>	Are	e such investigations documented and maintained?			
Ke	y C	Control			
30.		e keys to locked box tickets maintained by a department ependent of the keno function?			
31.	acc	omeone independent of the keno department required to ompany such keys to the keno area and observe repairs or lls each time locked boxes are accessed?			
32.	seq	the master panel, which safeguards the wiring that controls the uence of the game, locked at all times to prevent unauthorized tess?			
33.		e master panel keys maintained by a department independent of keno function?			

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		Yes	No	W/P Ref.
34.	Is someone independent of the keno department required to accompany such keys to the keno area and observe repairs, etc., each time the master panel is accessed?	<u>168</u>	<u>No</u> 	<u>KCI</u> .
35.	Are microfilm machine keys maintained by personnel who are independent of the keno writer function?			
36.	Is someone independent of the keno writer function (e.g., a keno supervisor who doesn't write or someone independent of keno) required to observe each time the microfilm machine is accessed by keno personnel?			
37.	Is the keno equipment discussed above always locked when not being accessed?			
38.	Are all electrical connections wired in such a manner so as to prevent tampering?			
39.	Are duplicate keys to the above areas maintained independently of the keno department?			
Ke	no Audit			
40.	Is the keno audit function independent of the keno shift being audited for the next <u>two</u> requirements (41 and 42)?			
41.	Do keno audit personnel foot write (either inside ticket or restricted copy) and payouts (customer copy) to arrive at an audited win/loss by shift?			
<u>42.</u>	Do keno audit personnel obtain an audited win/loss for each bank (i.e., individual writer or community)?			
43.	Is the keno audit function is independent of the keno department for the next <u>five</u> requirements (44-48)?			
44.	Are the keno receipts (net cash proceeds) compared with the audited win/loss by keno audit personnel?			
45.	Are major cash variances (i.e., overages or shortages in excess of \$25.00) noted in the preceding comparison investigated on a timely basis?			

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46.	wee	a sample basis (for at least one race per shift or ten races per ek) do keno audit personnel perform the following, where blicable:	<u>Yes</u>	<u>No</u>	W/P <u>Ref</u> .
	a.	Select a sample whereby the majority of the races in the sample selected must contain payouts in excess of \$100.00 but less than the amount established for the independent verification required by Question #25?			
	b.	Regrade winning tickets utilizing the payout schedule and draw tickets and compare winning tickets (inside and outside) to restricted copies (locked box copy, developed microfilm, videotape, etc.) for 100% of all winning tickets of \$100.00 or greater and 25% of all winning tickets under \$100.00 for those races selected?			
	c.	Either review sequential numbering on inside tickets (microfilm and videotape systems) to ensure that tickets have not been destroyed to alter the amount of write? or			
	d.	Compute write from developed film and compare to write computed from inside tickets?			
	e.	Review restricted copies for blank tickets and proper voiding of voids?			
47.		addition to the above audit procedures, when a keno game is erated by one person:			
	a.	Are at least 25% of all other winning tickets regraded?			
	b.	Are at least 10% of all tickets traced to the restricted copy?			
	c.	Is the film of rabbit ears randomly compared to draw tickets for at least 25% of the races?			
48.	per ind be o	e draw tickets compared to rabbit ears film for at least five races week with payouts which do not require draw ticket verification ependent of the keno department? (The draw information can compared to the rabbit ears at the time the balls are drawn wided it is done without the knowledge of keno personnel and it ubsequently compared to the keno draw ticket.)			

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		Yes	No	W/P Ref.
49.	Are audit procedures performed within one month following the transaction?	<u>165</u>	<u>110</u>	<u>Kei</u> .
<u>50.</u>	Is documentation (e.g., logs, checklists, etc.) maintained evidencing the performance of all keno audit procedures?			
<u>51.</u>	Does non-keno management review keno audit exceptions, perform investigations into unresolved exceptions and document results?			
Mi	scellaneous			
<u>52.</u>	Are all copies of all keno tickets and the film of the rabbit ears maintained for at least 7 days?			
53.	Are all copies of winning keno tickets of \$1,500 or more maintained for at least five years? This includes restricted copies (microfilm, videotape, etc.).			
	Note: The restricted copy may be maintained in the form of a copy made from the microfilm, videotape, etc.			
Μι	ılti-Race			
54.	Are procedures established to notify keno personnel immediately of large multi-race winners to ensure compliance with Question 25?			
55.	Do controls exist to ensure that keno personnel are aware of multi- race tickets still in process at the end of a shift?			

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